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**Hearing Date and Time: October 24,
2011 at 10:00 a.m.**

Attorneys for Unifrax I LLC f/k/a Unifrax Corporation

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	x
DELPHI CORPORATION, <u>et al.</u> ,	:	Chapter 11
	:	Case No. 05-44481 (RDD)
Debtors.	:	Jointly Administered
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	x
Plaintiffs,	:	Adv. Pro. No. 07-02270 (RDD)
	:	
- against -	:	
BP, BP AMOCO CORP, BP MICROSYSTEMS	:	
INC., BP PRODUCTS NORTH AMERICA,	:	
CASTROL, CASTROL INDUSTRIAL	:	
AND UNIFRAX CORP.	:	
Defendant.	:	

**JOINDER OF UNIFRAX I LLC TO HERAEUS DEFENDANTS' REPLY IN
OPPOSITION TO THE REORGANIZED DEBTORS' MOTION FOR LEAVE TO
FILE AMENDED COMPLAINTS, TO SUPPLEMENT THE RECORD OF THE
JUNE 21, 2011 HEARING AND TO FILE THE REORGANIZED DEBTORS' STATEMENT
REGARDING SERVICE OF THE FINAL EXTENSION MOTION AND IN REPLY TO
DEBTORS' AMENDED OMNIBUS RESPONSE**

Defendant Unifrax Corporation (“Unifrax” or “Defendant”), now known as Unifrax I LLC, by and through its counsel, Hodgson Russ, LLP, hereby submits its Joinder to Heraeus Precious Metals, LLC and Heraeus Metals Processing’s Memorandum in opposition to the Reorganized Debtors’ Motions for Leave to File Amended Complaints, for Leave to Supplement the Record of the June 21, 2011 Hearing, for Leave to File the Debtors’ Statement Regarding Service of the Final Extension Motion and in Reply to the Debtors’ Amended Omnibus Response, dated September 13, 2011 to Certain Defendants’ Submissions Regarding the October 2, 2009 Supplemental Postconfirmation Extension of Avoidance Actions Service Deadline Motion.

In the interest of judicial economy, Unifrax will not repeat and restate the arguments advanced by similarly situated parties in response to the Debtors’ pending motions. Unifrax joins and adopts all relevant arguments and authorities, as if fully stated herein, set forth in Heraeus Precious Metals, LLC and Heraeus Metals Processing’s Reply Brief (Adv. Pro. No. 07-02445, Docket No. 39; Adv. Pro. No. 07-02442, Docket No. 51) (Case No. 05-44481, Docket No. 21623) as well as in all other objections filed by similarly situated defendants as is they were set forth herein in their entirety. Unifrax reserves its right to supplement this Joinder, including but not limited to providing documentary evidence, and to appear at any and all hearings and conferences scheduled on the Motions.

Dated: October 11, 2010

HODGSON RUSS LLP
*Attorneys for Unifrax I, LLC f/k/a
Unifrax Corporation*

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